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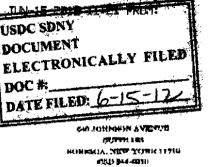
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June 14, 2012

VIA FAX TRANSMISSION; (212) 805-7942

Hon. Alvin K. Hellerstein United States District Court Southern District of New York 500 Pearl Street, Room 1050 New York, N.Y.

Re:

World Trade Center Litigation 21 mc 102 and 21 mc 103



Dear Judge Hellerstein:

This office represents Hillmann Environmental Group, LLC in the above litigation. We are writing jointly with plaintiffs' liaison counsel, Greg Caunata and Robert Grochow concerning the scheduling of depositions.

Hillmann is a named defendant in hundreds of cases involving Hillmann's work at four buildings. 140 West Street (Verizon). One Liberty Plaza, 22 Cortiandt and 2 World Financial Center. Hillmann was already deposed regarding 22 Cortlandt and we have scheduled dates for Verizon and One Liberty. We have been working with plaintiff's counsel to schedule a date for 2 World Financial Center.

Due to the number of depositions scheduled as well as work commitments and personal commitments, it is impossible to arrange a date that is acceptable for all concerned within the court deadline of August 3, 2012. We are asking that we be permitted to produce our witness on a mutually convenient date of August 9 or 10. We note that while these dates are beyond the August 3rd cut off, they are before the next scheduled court conference of August 15rd. No prior application has been made for the relief requested herein.

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Re: World Trade Center Litigation 21 mc 102 and 21 mc 103

Thank you for your consideration herein.

Respectfully submitted,

Вут

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